

combination further augmented by *W3C's Scalable Vector Graphics Specification* (February 11, 1999)(hereinafter "*W3C*"). Claim 13 stands rejected under the first combination above further in view of *Adobe Acrobat 3.0 Online Guide* (hereinafter "*Online Guide*"). Claims 6, 15-17, 19-21, 24-26, 28, and 29 stand rejected under the first combination above further in view of *EduPage Newsletter* (February 4, 1997)(hereinafter "*EduPage*"). Finally, claims 27 and 30 stand rejected as obvious in view of the aforementioned combination further augmented by "*HTML Tags at a Glance*" (hereinafter "*HTML Tags*").

To avoid undue repetition, Applicants will discuss only several primary items of clarification with the understanding that the remaining arguments, such as discussed in the prior response, are not waived but are herein reasserted by reference.

As discussed in the prior response with reference to the independent claims, each claim generally pertains to a document, a document model, and a thumbnail registered with the document model. The Office's current position appears to be that the prior art teaches documents, the prior art teaches thumbnails, and the prior art teaches document models. Although the Office has expressly noted that there is no teaching in the cited art that a thumbnail could be registered with the cited model (SGML), the action states that such would be obvious. Thus, Applicants respectfully request clarification as follows:

1. If an "SGML" document is the "model" of the claims, please clarify precisely how this model is registered with the thumbnail of *Martin*. For example, what tangible aspect of an SGML document is asserted to comprise the model, and furthermore what part of that tangible aspect is registered with what part of a thumbnail, and in what way is the registration done.

2. Even assuming, as asserted in the action, that “it was common at the time to represent a document using a reduced image of the same document,” (see action p. 3, 3rd full para. and page 13 1st full para.), how does this motivate one to arrive at the claimed combinations. For example, the action already indicates that *Martin* teaches thumbnails, and yet also acknowledges that this teaching falls short of the claimed subject matter (see action p. 3, lines 1-2).

3. If, as seemingly asserted by the Office, *GroupLab* already teaches one how to view particular portions of a document in a larger format by interacting with something analogous to a thumbnail (action at p. 3, 1st full para.), then what precisely is the motivation to modify this art to achieve the same end via a document model. In other words, if the assertion is that *GroupLab* already teaches the end *result* of the claimed combination, then what would motivate one of skill in the art to nonetheless *change* the process of *GroupLab* to use a document model *without* changing the end result of the process?

4. Overall, if it continues to be the Office’s position that a combination of *Martin*, *Framemaker*, and *GroupLab* teaches the subject matter of each of the independent claims, such as claim 1, then please be more specific regarding the precise elements of the combination, perhaps by reference to claim 1. For example, please:

- a. Clearly identify where each claim component is discussed in each reference, and then
- b. Give an example, supported by the cited references if possible, of *how* the claimed combination operates (i.e., “*this* element is the model, *this piece* of the model is what is *registered* with the thumbnail in this way, such that *these coordinates* of the thumbnail are mapped via the model to *this data structure*.”)

In re Appln. of LAWTON et al.
Serial No. 09/260,837

Conclusion

The application is considered in good and proper form for allowance, and the Examiner is respectfully requested to pass this application to issue. Applicants feel that a telephone conference may expedite the prosecution of the subject application, and would appreciate the opportunity to schedule such an interview at the Examiner's convenience once the Examiner has reviewed these remarks.

Respectfully submitted,



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